

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

JANE DOE,

Plaintiff,

v.

THE RIVERWOODS COMPANY, AT
EXETER, NEW HAMPSHIRE

Defendant.

Case No. 1:21-cv-338

**ASSENTED-TO MOTION FOR PLAINTIFF TO PROCEED UNDER ALIAS
AND TO SEAL DOCUMENTS CONTAINING HER NAME**

Plaintiff moves this Court to proceed in this case by using an alias – Jane Doe – in place of the true name of the Plaintiff. Plaintiff further moves to submit an affidavit to the Court identifying her true name and asks that the Court seal this affidavit and any other documents which may need to be filed with the Court that contain her true name.

As set forth in the Complaint, Plaintiff alleges, among other things, that Defendant violated her rights under the Family Medical Leave Act (FMLA), Americans with Disabilities Act (ADA), and Section 504 of the Rehabilitation Act (Rehab Act). The Plaintiff's daughter has a disability and Plaintiff obtained approval from Defendant to take intermittent FMLA leave, if necessary, to care for her daughter. Plaintiff alleges that Defendant violated her rights by, among other things, interfering with her FMLA rights, retaliating against her for obtaining approval to take intermittent FMLA leave, and discriminating against her because of her association with her disabled daughter. Plaintiff's daughter is a minor and revealing Plaintiff's name in this case would potentially reveal to others that her daughter has a disability. Plaintiff, thus, requests to proceed in this case under an alias in order to protect her daughter's privacy interests.

Defendant assents to the relief requested in this motion and, as such, a memorandum of law is not necessary.

Wherefore, Plaintiff requests that the Court permit Plaintiff to proceed in this case under the alias Jane Doe; that the Court order all documents filed with the Court to identify Plaintiff as Jane Doe unless they are filed under seal; that the Court order that all documents made publicly available in this case not contain Plaintiff's true name; and that the Court permit Plaintiff to file an affidavit under seal which identifies her true name.

Respectfully submitted,

Dated: April 27, 2021

/s/ Allan K. Townsend

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